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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

January 26, 2016

Ms. Linda Haugan, Assistant County Administrator
San Bernardino County Human Services System
385 N. Arrowhead Drive, 5th Floor
San Bernardino, CA 92415-0140

Dear Ms. Haugan:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of **August 17 - 20, 2015**. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact **Cindy Guzman** at (916) **654-2117**. You may also contact her by e-mail at cindy.guzman@dss.ca.gov.

Sincerely,

Original signed by Bureau Chief

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Denise Shefchik, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
San Bernardino County Human Services System**

**Conducted on
June 17 – 20, 2015**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: Cindy Guzman

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Sacramento County Department of Human Assistance with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on **August 17 - 20, 2015**. An exit interview was held to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Redlands TAD	1811 W. Lugonia Avenue, Redlands, CA	CalFresh/CalWorks, WTW	Spanish
Rancho CFS	9518 E. 9th Street, Rancho Cucamonga, CA	Children's, ER, Reunification	Spanish
Rialto TAD	1175 W. Foothill Blvd., Rialto, CA 92376	CalFresh/CalWorks, WTW	Spanish
Adult Services	686 E. Mill Street, San Bernardino, CA 92415	Adult case review, IHSS, APS	Spanish
Vendor Contracts	150 South Lena Road, San Bernardino, CA	Vendor Contract Review	Spanish
Program Integrity	1111 E. Mill Street, San Bernardino, CA	Fraud Case Review	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2015 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocates groups. In this review the following organization was contacted for feedback:

Inland Counties Legal Services
San Bernardino Office
715 N. Arrowhead Avenue, Suite 113
San Bernardino, CA 92401

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	4	2
Children Social Workers	2	2
Adult Program Workers	2	1
Receptionist/Screeners	4	3
Total	12	8

Program Manager Surveys

Number of surveys distributed	1
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	7
Non-English or limited-English speakers' case files reviewed	125
Languages of clients' cases	Spanish, Vietnamese, Cambodian, Arabic, Tagalog, Thai, Korean, Mandarin Chinese, Indonesian, Farsi, ASL, Romanian, English.

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section X highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Accommodations for working clients or clients involved in welfare-to-work activities can be accommodated within building hours from 7:00 A.M. to 6:00 P.M. IHSS hours are as early as 7:00 A.M. each work day Monday-Friday in order to accommodate working clients.
Does the county have extended hours to accommodate clients?	X			The Redlands Office extended hours can be made within the building hours of 7:00 A.M. to 6:00 P.M. Rancho Children and Family Services, Rancho Cucamonga office extended hours can be arranged through a social worker. Rialto TAD Office routinely accommodates customers during building hours of 7:00 A.M. to 6:00 P.M., IHSS and APS programs are as early at 7:00 A.M., and if APS services are needed, those services may be accessed 24 hours per day, 7 days per week.

Can applicants access services when they cannot go to the office?	X			Interviews for most programs can be done over the phone, if necessary; a worker will visit the customer in their home or other designated location. Also available to our customers is the C4 yourself.com. Customers can also utilize the Customer Service Center, Mail applications, or home call.
Does the county ensure the awareness of available services for individuals in remote areas?	X			San Bernardino County has offices in Needles, Barstow, Yucca Valley, and Rancho Cucamonga, Victorville, San Bernardino and also very remote areas of Trona, Baker and Superior Valley. The Senior Information and Referral program staff provides outreach services to these communities in order to make individuals aware of available services. There is also outreach through social media, and the county website. The New Initiative Unit holds monthly Building Community Partnership Meetings.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	X			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			The Pub 13 is available in large print (English and Spanish), audiocassette and Braille.
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All workers interviewed knew the Civil Rights Coordinator's name and where to find her contact information.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

B. Corrective Actions/None

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: 1811 W. Lugonia, Redlands, CA 92374

Facility Element	Findings	Corrective Action
Men's Restroom	Door pressure too high at 6 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 224
Women's Restroom	Door pressure too high at 10 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 224

2. Facility Location: 9518 E. 9th Street, Rancho Cucamonga, CA 91730

There were no findings at this site.

3. Facility Location: 1175 W. Foothill Blvd., Rialto, CA 92376

Facility Element	Findings	Corrective Action
Men's Restroom	Door pressure too high at 9 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 224
Women's Restroom	Door pressure too high at 11 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg. 224

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			The county uses the I-Speak cards at the front lobby where the client can self-identity their language preference needed. The county uses a red flag identifier in the system to identify language, and any special accommodations needed. The case files are annotated with the language using various modes within the Departments. TAD is case flagged, and use narrative

Question	Yes	No	Some-times	Comments
				templates; Adult Services uses the face sheet form filed on top & green dot on the outside to identify the language need; Children Services used the Orange sticker CFS CFRI, on the outside of the file annotated with the language need and how bilingual services were met.
Does the county use a primary language form?		X		The county uses the application where the language is self-identified by the customer/client. County Form RTIS 49 is used to request for translation & interpretation services.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			County Form RTIS 49 is used to request for translation & interpretation services.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Clients are assigned to a bilingual worker according to their selected preferred language. When staff needs an interpreter, they contact their supervisor, or the Civil Rights Coordinator (CRC). The county has contracted interpreter agencies that provide telephonic interpretation including after hours and weekends.
Is there a delay in providing services?		X		Staff interviewed stated they do not believe there is a delay in providing bilingual services at this time.
Does the county have a language line provider, a	X			The county has contracted interpreter agencies that provide

Question	Yes	No	Some-times	Comments
county interpreter list, or any other interpreter process?				<p>telephonic interpretation including after hours and weekends.</p> <p>The county has a county worker interpreter lists they can access. They contact the CRC who also provides them resources to procure an interpreter.</p> <p>County Form RTIS 49 is used to request for translation & interpretation services.</p>
Are county interpreters determined to be competent?	X			Only certified interpreters are used for client's needs.
Does the county have adequate interpreter services?	X			Staff interviewed has responded that they have adequate interpreter services.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		The county does not allow minors to be interpreters. Only in an emergency situation for basic contact, or to reschedule an appointment would this be allowed.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			

Question	Yes	No	Some-times	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			<p>San Bernardino county is in the process of developing the process for implementing the services below: The CDSS has recently developed services for clients who are Blind and Visually Impaired, these services include: Telephone Timesheet System, Braille Notices of Action, Audio CD NOAs, data CD NOAs</p> <p>San Bernardino County uses TDD phone line, and ASL Interpreter Services.</p>
Does the county identify a client with a disability (physical, mental, or learning)?	X			This is done in the Welfare to Work Program.
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?	X			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			<p>Referrals for services to community organizations that can provide prompt and effective services without undue delays. Other means, such as reading a form to an applicant/recipient, and to narrate the action taken in journal.</p>

Question	Yes	No	Some-times	Comments
Does the county offer screening for learning disabilities?	X			In the Welfare to Work Program.
Is there an established process for offering screening?	X			In the Welfare to Work Program.
Is the client identified as having a learning disability referred for evaluation?	X			Referrals for services to community organizations that can provide prompt and effective services without undue delays. Other means, such as reading a form to an applicant/recipient, and to narrate the action taken in journal.

B. Corrective Actions/None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	Orange sticker on outside of case files CFS CFR1	SOC 341; IHSS Intake Face Sheet	C-IV; TAD 229 – Release Form; Case flags, and narrative templates	C-IV; TAD 229 – Release Form; Case flags, and narrative templates

Documented Item	Children's	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Primary language documentation	Orange sticker on outside of case files CFS CFR1	SOC 341; IHSS Intake; Face Sheet SOC 426	C-IV; TAD 229 - Release Form; Journal Detail Classic	C-IV; TAD 229 - Release Form; Journal Detail Classic
Method of providing bilingual services and documentation	Investigative Report Narrative – RTIS 49 – Request For Translation & Interpretation Services Form	Interpreter Special Needs Form; CMIPS RTIS 49 – Request For Translation & Interpretation Services Form	C-IV; Journal Detail Classic; RTIS 49 – Request For Translation & Interpretation Services Form	C-IV; Journal Detail Classic; RTIS 49 – Request For Translation & Interpretation Services Form
Client provided own interpreter	Investigative Report Narrative	Interpreter Special Needs Form; CMIPS	C-IV; Journal Detail Classic	C-IV Journal Detail Classic
Method to inform client of potential problem using own interpreter	Explained to client and family.	Interpreter Special Needs Form	TAD 229 - Release Form	TAD 229 - Release Form
Release of information to Interpreter	Interpreter Special Needs Form	Interpreter Special Needs Form	TAD 229 - Release Form	TAD 229 - Release Form
Individual's acceptance or refusal of written material offered in primary language	Case files Investigative Narratives; Contact Notes; Transfer Summaries.	IHSS Intake Interpreter Special Needs Form	C-IV; Journal Detail Classic	C-IV Journal Detail Classic

Documented Item	Children's	Adult Programs (IHSS & APS)	CalWORKs & Employment Services	Non-Assistance CalFresh
Documentation of minor used as interpreter	Would be in Case files Investigative Narratives; Contact Notes; Transfer Summaries. None found in cases reviewed.	Would be in CMIPS – None found in cases reviewed	Would be in Journal Detail - None found in cases reviewed.	Would be in Journal Detail - None found in cases reviewed.
Documentation of circumstances for using minor interpreter temporarily	Would be in Case files Investigative Narratives; Contact Notes; Transfer Summaries. None found in cases reviewed.	Would be in CMIPS – None found in cases reviewed	Would be in Journal Detail - None found in cases reviewed.	Would be in Journal Detail - None found in cases reviewed.
Method of identifying client's disability	Orange Flag on Folders	IHSS Intake Interpreter Special Needs Form	C-IV; Journal Detail Classic; Red Flag	C-IV; Journal Detail Classic; Red Flag

B. Corrective Actions/None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			All employees interviewed stated they have had Division 21 training.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			In one of the surveys it was noted that although the Department is in the beginning stages of creating a Department Diversity Committee, they do not feel that they have developed adequate training in regards to Cultural Awareness. CDSS IHSS Training Academy included a training segment on Cultural Awareness but the training is not held regularly. In telephone interviews it was stated that Diversity and Cultural Awareness is part of their training where they take a test after each chapter online.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions/None**VIII. DISCRIMINATION COMPLAINT PROCEDURES**

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			All staff interviewed could identify the difference between program discrimination, and a personnel complaint.
Did the employees know who the Civil Rights Coordinator is?	X			All staff interviewed could identify who the Civil Rights Coordinator is.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	X			

B. Corrective Action/None

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

A. There was not a reply from the Advocates who were notified for this review.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Bernardino County Human Services System Civil Rights Compliance Plan for the period 2014 - 2015, was received on March 23, 2015. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the San Bernardino County Human Services System staff warm, welcoming, informative and very supportive. Particular thanks to Denise Shefchik, Civil Rights Coordinator, for organizing the details of the review.

In each District Office, staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the San Bernardino County Human Services System in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The San Bernardino County Human Services System must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.